State of California—Health and Human Services Agency
California Department of Public Health

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*Director/ & State Health Officer*

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August 7, 2012

# IMPORTANT NOTICE

Dear Laboratory Director:

## US EPA METHODS UPDATE

This notice is being sent to all certified/accredited Waste Water testing laboratories in the Environmental Laboratory Accreditation Program (ELAP).

On May 18, 2012 the USEPA issued "Guidelines for Establishing Test Procedures for the Analysis of Pollutants under the Clean Water Act; Analysis and Sampling Procedures; Final Rule". The following is a summary highlighting the most significant changes promulgated under this rule.

## SUMMARY

This Method Update Rule (MUR) 2012 makes significant changes in test procedures for the analysis and sampling under the Clean Water Act (CWA). This Rule became effective June 18, 2012 and may impact your certification and require changes to your laboratory procedures as of that date.

The final rule approves several new methods and made changes to previously approved methods. The rule also contains a number of changes to previously approved methods and changes to sample collection, preservation and holding times.

The most significant change is the addition of section 136.7 that discusses the new standardized quality assurance and quality control requirements for all analyses. These QA/QC procedures are generally included in the analytical method or may be part of the methods compendium for approved part 136 methods from a consensus organization.

If the approved method lacks QA/QC procedures, the laboratory has the following options to comply with the QA/QC requirements:

1. Refer to and follow the QA/QC published in the "equivalent" EPA Method for that parameter that did contain QA/QC procedures;
2. Refer to the appropriate QA/QC section(s) of an approved Part 136 method from a consensus organization compendium (such as part 1000, 2000, 3000, etc. of Standard Methods); or
3. Incorporate the following twelve quality control elements, where applicable, into the laboratory's documented standard operating procedure (SOP) for performing compliance analyses when using an approved Part 136 method when the method lacks such QA/QC procedures.

   One or more of the twelve QC elements may not apply to a given method and may be omitted if a written rationale is provided indicating why the element(s) is/are inappropriate for a specific method.
   (i) Demonstration of Capability (DOC);
   (ii) Method Detection Limit (MDL);
   (iii)Laboratory reagent blank (LRB), also referred to as method blank (MB);
   (iv)Laboratory fortified blank (LFB), also referred to as a spiked blank, or laboratory control sample (LCS);
   (v) Matrix spike (MS) and matrix spike duplicate (MSD), or laboratory fortified matrix (LFM) and LFM duplicate, may be used for suspected matrix interference problems to assess precision;
   (vi) Internal standards (for GC/MS analyses), surrogate standards (for organic analysis) or tracers (for radiochemistry);
   (vii) Calibration (initial and continuing), also referred to as initial calibration verification (ICV) and continuing calibration verification (CCV);
   (viii) Control charts (or other trend analyses of quality control results);
   (ix) Corrective action (root cause analysis);
   (x) QC acceptance criteria;
   (xi) Definitions of preparation and analytical batches that may drive QC frequencies;
   (xii) Minimum frequency for conducting all QC elements.

   These twelve quality control elements must be clearly documented in the SOP for each analytical method not containing QA/QC procedures, where applicable.

It is your responsibility to read, understand and comply with the provisions of the MUR. In addition, changes as described in this notice describe most of the information as listed but it is not inclusive of all changes as listed in the MUR.

1. Please refer to the ELAP website for the following important information:

   a. Guidelines Establishing Test Procedures for the Analysis of Pollutants Under the Clean Water Act; Analysis and Sampling Procedures; Final Rule Federal Register / Vol. 77 , No. 97 / Friday, May 18, 2012 / Rules and Regulations

http://www.gpo.gov/fdsys/pkg/FR-2012-05-18/html/2012-10210.htm

b. FOT/FOA Forms (Currently under development)

2. You are not required to notify ELAP of the effective implementation of the changes and you will not receive a revised certificate that reflects these changes until your certificate is renewed.

3. Unless new test methods are needed, the accreditation for your laboratory will remain as it is until the renewal period for your laboratory.

4. For new test methods as listed in the MUR, a formal amendment application, fees and PT sample analysis will be required. If you are requesting to add a method to your certificate that is not an equivalent technology to a method for which you are currently certified, you must file an amendment application and pay the appropriate fees. If you are not sure whether a method is equivalent, please contact ELAP.

5. Please note that this rule DOES NOT apply to Drinking Water Methods or the Solid/Hazardous Waste Methods or their related Fields of Accreditation at this time. This includes any holding time changes.

6. The changes discussed here apply to both ELAP certified and NELAP accredited laboratories.

Please make sure that all the information provided is thoroughly reviewed, understood and complied with by June 18, 2013.

Should you have any questions, please contact your current ELAP auditor.

Sincerely,

David Mazzera, Ph.D.
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